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JENNER & BLOCK LLP

November 3, 2023

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VIA ECF

Magistrate Judge Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: ***Disberry v. Emp. Relations Comm. of the Colgate-Palmolive Company,
et al. - Case No. 22-CV-5778***

Dear Magistrate Judge Wang:

As a follow up to the November 1, 2023 pre-settlement conference call, Paula Disberry (“Plaintiff”), Defendant Employee Relations Committee of the Colgate-Palmolive Company (the “Committee”), and Defendant Alight Solutions, LLC (“Alight”) (collectively, the “Parties”) submit the following proposed settlement dates, and request that the case schedule be adjusted to allow such discussions to occur before the parties proceed with the remaining portions of the case.

1. Settlement Discussions:

Per your request, the parties have conferred and identified the following dates when they are jointly or individually available for settlement discussions.

- All parties
 - Monday, December 18
 - Tuesday, December 19
- Plaintiff Paula Disberry – Other dates
 - Any weekday between Dec. 4 and Dec. 15
 - Nov. 9 (10-11:30am Eastern Time)
 - Nov. 15 (10-11:30am Eastern Time)
- Defendant Alight – Other dates
 - Monday, December 11
 - Wednesday, December 13
 - Friday, December 15
- Defendant Employee Relations Committee – Other dates

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- Wednesday, December 20
- Thursday, December 21
- Friday, December 22

Plaintiff's counsel confirms that Plaintiff is fine with conducting these by audio instead of video. However, due to international phone costs, she requests that the calls with Plaintiff be done via Teams or Zoom (audio only). Plaintiff's counsel is happy to provide the Zoom link, or is happy to use the Court's Teams link.

2. Request for Extension of Case Deadlines:

In addition, to facilitate settlement discussions, the parties request that all pending deadlines be extended by 60 days.

	Current Deadline	Proposed Deadline
Dispositive Motions and Joint Pre-trial Order	November 9, 2023	January 8, 2024
Responses to Dispositive Motions	November 30, 2023	January 31, 2024
Replies in Support of Dispositive Motions	December 11, 2023	February 12, 2024

Respectfully Submitted,

/s/ Joseph J. Torres

Joseph Torres

cc: All Counsel of Record (via ECF)